

#### Comments for Option #4, No Significant change.

We have some concerns if the “no significant change” option were to be implemented.

1. How would the data values be reported? Our data base is structured on the data base developed by TRI-ME reports for the current reporting year. If a “no significant change” certification is received, how will numerical data it be entered into the data base along with the other real reports? The data base, as far as we can determine, does not have the capability to update current year data with the previous year’s data. Would the states be required to manually enter last year’s data into this year’s data base? Although we could reload data from our backup disk, this seems cumbersome, and with the changing design of Form R, would probably not work.
2. We believe that the public is in the best position to make the determination of what constitutes “no significant change”. We see some year-to-year variation from facilities now, even though they report a PI of 100. Also, some facilities show a downward trend through P2 and other efforts even though their PI may be 100 or greater, and we believe that they and the public would like to see these efforts documented instead of just showing a straight line or “no significant change”. If you provide the option of reporting actual values or “no significant change”, the reporters of increases but within the criteria will opt for “no significant change”, and the reporters of decreases will opt for actual values. This may tend to skew the data. If you continue to require actual value reporting every year from all facilities, this would allow the public, to whom we report, make its own determination as to what constitutes “no significant change” instead of having someone in our system make that determination for them.
3. We doubt that we could develop a set of criteria that would allow reporting “no significant change” that would be perceived as fair to all reporters. Whatever criteria used would no doubt be challenged by a facility or group of facilities still required to report actual values as unfair and showing favoritism to the groups allowed to report “no significant change”. We see that now regarding reporting nitrates, where groups of facilities are not required to report.

## Comments for Option #5, Use of Range Reporting for Section 8.

We believe that we should be consistent between the sections, and we generally do not favor range reporting because in the final analysis we must use numbers. We currently encourage facilities to not use range reporting at all.

1. Range reporting does a disservice to those reporters who are at the bottom end of a range and allows facilities that are at the top of the range underreport. If a facility estimates a release at 15 pounds and reports "B", it will get credit for 250 pounds in the system, as will a facility that estimates a release of 450 pounds. When our data check calculation compares the values in sections 5 and 6 with 8.1 an error will occur because of the differences in values. Although we can see what most likely caused the error, it is an error that would not have existed if not for the range reporting.
2. When facilities realize how their data will be processed, those at the low end of their range would be more likely to report actual values, while those at the top end of the range would be more likely to report the range letter value to take advantage of the rounding down. This would skew the data.
3. Since actual values are already estimated or calculated now for section 8, there would appear to be little, if any additional burden for eliminating ranges codes. We believe that this not an unreasonable burden, as they eventually calculate the values for Section 8. The burden reduction appears to be small for expanding the use of range reporting, as only about 10% of our reports now use range codes in reporting off-site transfers, the section with the highest incidence of range codes. Many of these reports also use range codes in section 5.